

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(SOUTHERN DIVISION)

THE HUMANE SOCIETY  
OF THE UNITED STATES, et al.

Plaintiffs,

v.

NATIONAL UNION FIRE INSURANCE  
COMPANY OF PITTSBURGH, PA

Defendant

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Case No.: DKC-13cv-1822

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**JOINT STATUS REPORT**

Plaintiffs, The Humane Society of the United States (“HSUS”), Jonathan Lovvorn and Kimberly Ockene, and Defendant, National Union Fire Insurance Company of Pittsburgh, Pa. (“National Union”), by and through their undersigned counsel, hereby file this Status Report pursuant to the Court’s July 17, 2014 Scheduling Order (E.C.F. No. 62):

a. **DISCOVERY STATUS**

It is National Union’s position that discovery is complete. Plaintiffs served a corporate designee deposition notice on National Union on October 1, 2014 scheduling the deposition in Washington, DC for October 10, 2014, which is the current discovery deadline. National Union has objected to that unilateral notice and is filing a Motion for Protective Order today.

b. **PENDING MOTIONS**

National Union anticipates filing a Motion for Protective Order on this date. Plaintiffs’ opposition would be due on October 27, 2014.

c. DISPOSITIVE PRETRIAL MOTIONS

Defendant intends to file a dispositive motion. Thus, pursuant to Local Rule 105(2)(c), the parties propose the following briefing schedule:

- Defendants to file dispositive motions by November 20, 2014;
- Plaintiffs to file opposition by December 11, 2014; and
- Defendants to file reply by January 6, 2015

d. JURY TRIAL

The parties anticipate that the trial in this matter will last no more than five days.

e. CERTIFICATION OF SETTLEMENT NEGOTIATIONS

The parties engaged in a private mediation with Retired Judge Frederick Smalkin on March 19, 2014 but were unable to resolve this matter.

f. SETTLEMENT OR ADR CONFERENCE

If this matter is not resolved on dispositive motions, National Union would be willing to participate in mediation following resolution of dispositive motions. HSUS does not feel that ADR would be productive.

g. U.S. MAGISTRATE JUDGE

The parties do not consent to proceeding before a Magistrate Judge.

h. OTHER MATTERS

The parties do not have other matters that need to be resolved.

Respectfully submitted,

/s/

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 10<sup>th</sup> day of October, 2014, a copy of National Union Fire Insurance Company of Pittsburgh, Pa.'s Status Report was served via electronic filing on:

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/s/

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